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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION  
DEVELOPMENT, LLC, a Delaware Limited  
Liability Company,

Case No.: 2:17-cv-03007-APG-VCF

v.  
Plaintiff,

REED HEIN & ASSOCIATES, LLC d/b/a  
TIMESHARE EXIT TEAM, a Washington  
Limited Liability Company; BRANDON  
REED, an individual and citizen of the State of  
Washington; TREVOR HEIN, an individual  
and citizen of Canada; THOMAS

**STIPULATION AND  
ORDER TO EXTEND DEADLINE TO  
RESPOND TO SGB'S MOTION TO  
DISMISS [ECF #204]**

## [Second Request]

PARENTEAU, an individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter, Goldmark & Bender, P.S. (“SGB”), hereby stipulate to extend Plaintiff’s deadline to file a response to SGB’s Special Motion to Dismiss Pursuant to NRS 41.660 [ECF #204]<sup>1</sup> (the “Motion”), currently set for May 29, 2020, until June 5, 2020, and as grounds state as follows:

1. On May 1, 2020, SGB filed the subject Motion.

2. Since SGB filed the Motion, both Plaintiff and SGB have been required to respond to voluminous discovery requests and respond to various motions filed in this case. *See, e.g.*, Plaintiff’s Responses to SGB’s Motion for Protective Order, [ECF #216], and Reed Hein’s Motion to Compel [ECF #214], and SGB’s response to Diamond’s Motion to Exceed the Deposition Limit [ECF #215], all filed on May 8, 2020. Additionally, Diamond has responded to the Defendants’ oppositions to Diamond’s Motion to Exceed the Deposition Limit.

3. Since SGB filed, Plaintiff has been diligently working to respond to the Motion, and Diamond’s response is well underway.

4. While Plaintiff has been working diligently, a personal issue has arisen that prevents Plaintiff from being able to file a response to SGB’s Motion prior to the current deadline of May 29, 2020.

5. As a result, Plaintiff and SGB have agreed to extend Plaintiff’s response deadline

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<sup>1</sup> The Motion was originally filed as ECF #202, but a corrected image was filed as ECF #204.

1 by one (1) week, until June 5, 2020.

2       6.     This stipulation is not made for purposes of delay.

3              Dated this 28th day of May, 2020

4 GREENSPOON MARDER, LLP

LIPSON NEILSON, P.C.

6 /s/ Phillip A. Silvestri, Esq.

7 /s/ Megan H. Hummel, Esq.

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11 Attorneys for Defendant  
12 Schroeter, Goldmark & Bender, P.S

13 IT IS SO ORDERED

14   
15 UNITED STATES DISTRICT JUDGE

16              5/28/2020  
17 DATED: \_\_\_\_\_

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